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STATE OF SOUTH CAROLINA  
STATE ETHICS COMMISSION

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STATE ETHICS  
COMMISSION

COMPLAINT FORM

FOR COMMISSION USE ONLY:

CASE NUMBER

C 2021-101

COMPLAINANT: State Ethics Commission  
ADDRESS: 201 Executive Center Drive  
Suite 150  
Columbia, SC 29210  
TELEPHONE NUMBER: (803) 253-4192

RESPONDENT: Stacy Danley  
ADDRESS: [REDACTED]  
TELEPHONE NUMBER: [REDACTED]  
TITLE: Director of Division, Institution, or Facility-  
South Carolina State University

Section 8-13-1140, SC Code Ann., 1976, as amended, requires the filing of an updated Statement of Economic Interests for the previous calendar year annually thereafter prior to March 30. Records in the State Ethics Commission indicate that the Respondent was required to file the 2018, 2019, 2020, and 2021 Statement of Economic Interests.

Respondent was reminded of the filing requirement by a certified letter dated March 18, 2020 as described in the attached. To date, no properly completed 2018, 2019, 2020, or 2021 Statement of Economic Interests has been received. All in violation of Section 8-13-1140, 1976, as amended.

All investigations, inquiries, hearings, and accompanying documents must remain confidential unless respondent waives the right to confidentiality. If there is a finding of probable cause, the following documents become public record: the complaint, the response (if any) by respondent, and the notice of hearing. If a hearing is to be held, the final order and all exhibits become public record. If no hearing is held following a finding of probable cause, the final disposition of the matter becomes public record. The willful release of confidential information is a misdemeanor, and any person releasing such confidential information, upon conviction, must be fined not more than one thousand dollars (\$1,000) or imprisoned not more than one year. Section 8-13-320(10)(g).

STATE OF SOUTH CAROLINA  
COUNTY OF Richland

Personally appeared before me Meghan L. Walker who, first being duly sworn, says that she has read and knows the contents of the above complaint and that the allegations contained therein, are true and correct to the best of her own knowledge, except for those matters therein based upon information and belief, and as to those she believes them to be true.

Sworn to and subscribed before me this  
21st day of October 2021

[REDACTED]  
Meghan L. Walker, Executive Director

Notary Public for South Carolina  
My Commission expires 8-11-2025

SEC-7 (Revised 8/2019)

REPLY TO: 201 Executive Center Drive, Suite 150, Columbia, South Carolina 29210 (803)253-4192  
FAXED COPIES WILL NOT BE ACCEPTED

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STATE OF SOUTH CAROLINA )  
COUNTY OF RICHLAND )  
  
IN THE MATTER OF: )  
  
Complaint C2021-101 )  
  
Stacy Danley )  
Respondent. )  
  
State Ethics Commission )  
Complainant. )  

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BEFORE THE STATE ETHICS COMMISSION

**NOTICE OF HEARING**

The State Ethics Commission has determined that there is probable cause pursuant to Section 8-13-320(10)(i), Code of Laws, South Carolina, 1976, as amended, to support the allegations made in the above-captioned complaint. The Commission will convene a formal hearing into the matter in accordance with Section 8-13-320(10)(i) & (j), Code of Laws, South Carolina, 1976, as amended, and State Ethics Commission Regulations, S.C. Code Ann. Regs. 52-707 (1997 Cum. Supp.) on Thursday, October 20, 2022 at 9:30 a.m. at the Commission Hearing Room located at: 201 Executive Center Drive, Suite 150, Columbia, South Carolina 29210.

The following allegations will be heard:

**COUNT ONE**  
**FAILURE TO FILE STATEMENT OF ECONOMIC INTERESTS**  
**SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED**

That Stacy Danley, Athletic Director for South Carolina State University, did in Richland County, fail to file a 2018 Statement of Economic Interests, in violation of Section 8-13-1140.

**COUNT TWO**  
**FAILURE TO FILE STATEMENT OF ECONOMIC INTERESTS**  
**SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED**

That Stacy Danley, Athletic Director for South Carolina State University, did in Richland County, fail to file a 2019 Statement of Economic Interests, in violation of Section 8-13-1140.

**COUNT THREE**  
**FAILURE TO FILE STATEMENT OF ECONOMIC INTERESTS**  
**SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED**


That Stacy Danley, Athletic Director for South Carolina State University, did in Richland County, fail to file a 2020 Statement of Economic Interests, in violation of Section 8-13-1140.

**COUNT FOUR**  
**FAILURE TO FILE STATEMENT OF ECONOMIC INTERESTS**  
**SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED**

That Stacy Danley, Athletic Director for South Carolina State University, did in Richland County, fail to file a 2021 Statement of Economic Interests, in violation of Section 8-13-1140.

You have the right to be represented by counsel, the right to call and examine witnesses, the right to introduce exhibits, and the right to cross-examine opposing witnesses. This hearing will be open to the public as required by Section 8-13-320(10)(j), Code of Laws, South Carolina, 1976, as amended. The procedures to be followed are set forth in the Administrative Procedures Act, Section 1-23-10, et seq., Code of Laws, South Carolina, 1976 as amended the State Ethics Act, Section 8-13-100, et seq., Code of Laws, South Carolina, 1976, as amended, and State Ethics Commission Regulations, S.C. Code Ann. Regs. 52-707 (1997 Cum. Supp.).

A pre-hearing conference may be scheduled prior to the hearing to allow exchange of witness lists and evidence, marking of exhibits, and disposition of motions or pleadings. In the event you fail to appear, judgment by default will be rendered against you. If there are any questions concerning the above notice or hearing times, please contact the State Ethics Commission.

  
Meghan L. Walker, Executive Director  
State Ethics Commission

Dated this 25<sup>th</sup> day,  
of July 2022.

*Certificate of Service by Certified Mail*

I hereby certify that a copy of this **NOTICE OF HEARING** was duly served on the RESPONDENT Stacy Danley, 300 College Ave., Orangeburg, SC 29117 by depositing said **NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 26<sup>th</sup> day of July 2022, by **CERTIFIED MAIL, E-RETURN RECEIPT REQUESTED**, appropriate postage affixed, and a return address clearly indicated on said envelope.



**Rachael O'Bryan, Administrative Assistant**

Columbia, South Carolina

State Ethics Commission

(803) 253-4192

STATE OF SOUTH CAROLINA	)	
COUNTY OF RICHLAND	)	BEFORE THE STATE ETHICS COMMISSION
	)	
IN THE MATTER OF:	)	
	)	
Complaint C2021-101	)	
	)	
Stacy Danley	)	<b>AMENDED</b>
Respondent.	)	<b>NOTICE OF HEARING</b>
	)	
State Ethics Commission	)	
Complainant.	)	
	)	

The State Ethics Commission has determined that there is probable cause pursuant to Section 8-13-320(10)(i), Code of Laws, South Carolina, 1976, as amended, to support the allegations made in the above-captioned complaint. The Commission will convene a formal hearing into the matter in accordance with Section 8-13-320(10)(i) & (j), Code of Laws, South Carolina, 1976, as amended, and State Ethics Commission Regulations, S.C. Code Ann. Regs. 52-707 (1997 Cum. Supp.) on Thursday, April 20, 2023 at 9:30 a.m. at the Commission Hearing Room located at: 201 Executive Center Drive, Suite 150, Columbia, South Carolina 29210.

The following allegations will be heard:

**COUNT ONE**  
**FAILURE TO FILE STATEMENT OF ECONOMIC INTERESTS**  
**SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED**

That Stacy Danley, Athletic Director for South Carolina State University, did in Richland County, fail to file a 2018 Statement of Economic Interests, in violation of Section 8-13-1140.

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**COUNT THREE**  
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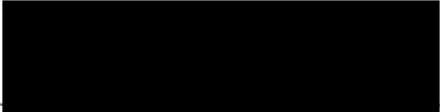
That Stacy Danley, Athletic Director for South Carolina State University, did in Richland County, fail to file a 2020 Statement of Economic Interests, in violation of Section 8-13-1140.

**COUNT FOUR**  
**FAILURE TO FILE STATEMENT OF ECONOMIC INTERESTS**  
**SECTION 8-13-1140, S.C. CODE ANN., 1976, AS AMENDED**

That Stacy Danley, Athletic Director for South Carolina State University, did in Richland County, fail to file a 2021 Statement of Economic Interests, in violation of Section 8-13-1140.

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A pre-hearing conference may be scheduled prior to the hearing to allow exchange of witness lists and evidence, marking of exhibits, and disposition of motions or pleadings. In the event you fail to appear, judgment by default will be rendered against you. If there are any questions concerning the above notice or hearing times, please contact the State Ethics Commission.

  
\_\_\_\_\_  
Meghan L. Walker, Executive Director  
State Ethics Commission

Dated this 20<sup>th</sup> day,  
of September 2022.

*Certificate of Service by Certified Mail*

I hereby certify that a copy of this **AMENDED NOTICE OF HEARING** was duly served on the RESPONDENT Stacy Danley, 121 Old Market Lane, Irmo, SC 29063 by depositing said **AMENDED NOTICE OF HEARING** in the United States mail, Columbia, South Carolina on this 22nd day of September 2022, by CERTIFIED MAIL, E-RETURN RECEIPT REQUESTED, appropriate postage affixed, and a return address clearly indicated on said envelope.



**Rachael O'Bryan, Administrative Assistant**

State Ethics Commission

(803) 253-4192

Columbia, South Carolina

STATE OF SOUTH CAROLINA	)	
COUNTY OF RICHLAND	)	BEFORE THE STATE ETHICS COMMISSION
	)	
IN THE MATTER OF:	)	
COMPLAINT C2021-101	)	
	)	
State Ethics Commission,	)	<b>CONSENT ORDER</b>
Complainant,	)	
	)	
Stacy Danley,	)	
Respondent.	)	
_____	)	

This matter comes before the State Ethics Commission (Commission) by way of a Complaint filed on October 21, 2021. Pursuant to Section 8-13-320(10)(i) of the South Carolina Ethics, Government Accountability, and Campaign Reform Act (Ethics Act), the Complaint against Stacy Danley (Respondent) was considered by the Commission and probable cause was found to warrant an evidentiary hearing. Prior to the call of the case, Respondent agreed to the following:

**STATEMENTS OF FACT**

1. Respondent was employed as the Athletic Director for South Carolina State University (SCSU) from April 2017 through August 2022.
2. In December of each year, the Commission sends all governmental entities an "Entity List." The Entity List contains the name of each person associated with the governmental entity who filed a SEI in the prior year. Upon receipt, the governmental entity edits the Entity List by removing or adding employees/officials as necessary, then returns the Entity List to the Commission.
3. In 2017, SCSU submitted its Entity List prior to Respondent's hiring.
4. In 2018, SCSU did not submit an Entity List to the Commission.
5. In 2019, 2020, and 2021, SCSU submitted an Entity List to the Commission adding Respondent to the list of individuals required to file an SEI. SCSU listed Respondent's address as P.O. Box 7308, Orangeburg, SC 29117.

6. Respondent did not file a Statement of Economic Interests (SEI) on or before March 30 in 2018,<sup>1</sup> 2019, 2020, or 2021.
7. On March 18, 2021, the Commission mailed a certified letter to P.O. Box 7308, Orangeburg, SC 29117. According to the United States Postal Service, this letter was delivered on March 22, 2021 and was signed for by Robert Johnson.
8. On April 1, 2021, late-filing penalties began to accrue at \$30 per day (\$10 per SEI).
9. On April 11, 2021, late-filing penalties began accruing at \$300 per day (\$100 per SEI).
10. Following the filing of the Complaint, a Commission Investigator contacted Respondent by telephone. Respondent indicated he had not received any correspondence from the Commission and stated he did not know Robert Johnson.
11. On October 25, 2022, Respondent came into compliance by filing his 2018, 2019, 2020, and 2021 SEIs, having accrued \$15,100 in late-filing penalties (\$5,000 each for the 2018, 2019, and 2020 SEIs and \$100 for the 2021 SEI).<sup>2</sup>

#### **CONCLUSIONS OF LAW**

Based upon the Statements of Fact, the Commission concludes, as a matter of law:

1. At all times relevant, Respondent was a “public employee” pursuant to Section 8-13-100(25). Therefore, the Commission has personal and subject matter jurisdiction.
2. Section 8-13-1110(B)(3) requires the director of a division of state government to file a SEI.
3. Section 8-13-1140 provides, in relevant part:

A person required to file a [SEI] under this chapter annually shall file . . . an updated

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<sup>1</sup> Respondent also failed to file a SEI prior to assuming his official responsibilities in April 2017, but was penalized for this failure outside of this Complaint.

<sup>2</sup> Respondent was not notified of his failure to file a 2021 SEI in the Commission’s March 18, 2021 certified letter because the March 30 deadline had not passed. Therefore, late-filing penalties only accrued as to the 2018, 2019, and 2020 SEIs.

statement for the previous calendar year, no later than noon on March 30 . . .

4. Section 8-13-1510(A) provides:

Except as otherwise specifically provided in this chapter, a person required to file a report or statement under this chapter who files a late statement or report or fails to file a required statement or report must be assessed a civil penalty as follows: (1) a fine of one hundred dollars if the statement or report is not filed within five days after the established deadline provided by law in this chapter; and (2) after notice has been given by certified or registered mail that a required statement or report has not been filed, a fine of ten dollars per calendar day for the first ten days after notice has been given, and one hundred dollars for each additional calendar day in which the required statement or report is not filed, not exceeding five thousand dollars.

5. Section 8-13-130 allows the Commission to “levy an enforcement or administrative fee on a person who is in violation” of the Ethics Act.

**DISCUSSION**

The Commission found probable cause to charge Respondent with four (4) counts of violating Section 8-13-1140 for failing to timely file his 2018, 2019, 2020, and 2021 SEIs. Through this Consent Order, Respondent acknowledges he failed to timely file the required SEIs. As mitigation, Respondent states SCSU did not advise him of the filing requirements when he was hired. Respondent states that the P.O. Box provided by SCSU belonged to SCSU and was not his mailing address. Respondent states he does not know anyone named Robert Johnson. Respondent further states that he never received any communication from the Commission until the Commission Investigator contacted him following the filing of the Complaint.

**DISPOSITION**

1. The Commission hereby finds Respondent in violation of four (4) counts of Section 8-13-1140.
2. The Commission hereby adopts the Statements of Fact, Conclusions of Law, Discussion, and Disposition as agreed upon by the Respondent.

THEREFORE, the Commission hereby issues a written warning and orders the Respondent to pay the Commission, within six (6) months from receipt of this Order, a reduced late-filing penalty of

\$400 (\$100 for each SEI). The remaining \$14,700 in accrued late-filing penalties is hereby waived given that Respondent did not receive certified notice of his failure to file the SEIs pursuant to Section 8-13-1510.

By executing this Consent Order, Respondent understands that he is not only admitting to violations of the Ethics Act, but also confessing to a judgment of \$400 (less any money paid to the Commission) in the event he does not make full and timely payment as provided for in this Order. In that event, the Commission shall file a Judgment against Respondent in the Clerk of Court's Office in the County of Respondent's last known residence. Upon said filing, the Clerk shall enter this Order in the amount of \$400 (less any money paid to the Commission) in its Judgment Rolls, without cost to the Commission.

AND IT IS SO ORDERED THIS 7<sup>th</sup> DAY OF May 2023.

STATE ETHICS COMMISSION

  
SCOTT E. FRICK, CHAIR

  
STACY DANLEY  
RESPONDENT